

Sabatini Freeman, LLC

216 N. Blakely St.
Dunmore, PA 18512

Statement as of: 3/24/2022

Clarence Lewis
312 Church St.
Taylor, PA 18517

Our file number: 3250-002

Rate Summary

Professional	Gross		Discount		Net
Brett Freeman	50.30 hours at \$350.00/hr	\$17,605.00	4.40 hours	(\$1,540.00)	\$16,065.00
Carlo Sabatini	11.10 hours at \$415.00/hr	\$4,606.50	3.00 hours	(\$1,245.00)	\$3,361.50
Ashley Werner	1.90 hours at \$150.00/hr	\$285.00	1.90 hours	(\$285.00)	\$0.00
Total:	63.30 hours (before discount)	\$22,496.50	9.30 hours	(\$3,070.00)	\$19,426.50

Itemized Listing of Services

<i>Date</i>	<i>Description</i>	<i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Discount</i>
10/02/2019	Receive and review email from Spivack regarding calling me tomorrow	CS 415.00	0.10	41.50	-41.50
10/03/2019	Prepare for phone call with Spivack	CS 415.00	0.10	41.50	0.00
11/18/2019	Review RESPA complaint for accuracy	ASW 150.00	0.30	45.00	-45.00
11/18/2019	Prepare RESPA Retainer Agreement	ASW 150.00	0.10	15.00	-15.00
11/18/2019	Conference with CS regarding TILA issue	BF 350.00	0.40	140.00	0.00
11/18/2019	Review retainer and amendment. Call to client. No answer, mailbox full. Email to client with retainer agreement	CS 415.00	0.20	83.00	0.00
11/23/2019	Call to client regarding representation agreement	CS 415.00	0.10	41.50	-41.50
11/25/2019	Email to client with retainer agreement.	CS 415.00	0.10	41.50	-41.50
11/25/2019	Receive and review email from client concurring with representation agreement.	CS 415.00	0.10	41.50	-41.50
01/17/2020	Work on discovery	CS 415.00	1.20	498.00	0.00
01/20/2020	Draft second discovery request	CS 415.00	1.50	622.50	0.00
01/23/2020	Review and edit amended complaint.	CS 415.00	1.00	415.00	0.00
01/23/2020	File amended complaint	CS 415.00	0.10	41.50	-41.50
01/27/2020	Conference with CS regarding offer of judgment.	BF 350.00	0.20	70.00	0.00
01/27/2020	Review file.	CS 415.00	0.10	41.50	-41.50
01/27/2020	Prepare redline of amended complaint per order filed on the docket	CS 415.00	0.50	207.50	-207.50
02/25/2020	Conference with CS regarding whether Rule 11 motion for asserting that RESPA does not require them to provide the name of the owner of the loan.	BF 350.00	0.20	70.00	-70.00

02/26/2020	Receive and review email from BF regarding Rule 11 Motion.	CS	415.00	0.10	41.50	-41.50
02/26/2020	Email to BF regarding designated address for RFI	CS	415.00	0.10	41.50	-41.50
03/02/2020	Receive and review email from Mishoe attaching Motion to Stay Discovery and corresponding documents	CS	415.00	0.10	41.50	-41.50
03/11/2020	Begin drafting brief	BF	350.00	4.60	1,610.00	0.00
03/12/2020	Continue drafting brief	BF	350.00	3.90	1,365.00	0.00
03/12/2020	Receive and review email from BF regarding cases cited. Conference with BF regarding the same.	CS	415.00	0.40	166.00	0.00
03/12/2020	Receive, review, and respond to email from BF regarding statutory damages under RESPA.	CS	415.00	0.10	41.50	0.00
03/16/2020	Receive and review email from BF regarding statutory damages.	CS	415.00	0.10	41.50	0.00
04/04/2020	Conference with CS regarding offer of judgment.	BF	350.00	0.20	70.00	0.00
04/09/2020	Conference with CS regarding TMS not consenting to amending complaint	BF	350.00	0.10	35.00	0.00
05/19/2020	Receive and review Matthew Haar's entry of appearance	ASW	150.00	0.10	15.00	-15.00
06/04/2020	Conference with CS regarding arguments for brief.	BF	350.00	0.30	105.00	0.00
09/10/2020	Receive and review email from Bonial & Associates, P.C. advising that they cannot accept an RFI	CS	415.00	0.10	41.50	0.00
09/24/2020	Prepare QWR to the Money Source	CS	415.00	0.80	332.00	0.00
09/25/2020	Travel time to post office. In post office. Travel back from post office	ASW	150.00	0.40	60.00	-60.00
03/01/2021	Draft request for information	BF	350.00	1.00	350.00	-350.00
03/04/2021	Research regarding appropriate remedy when a mortgage company seeks to collect fees without making a 3002.1 disclosure.	BF	350.00	0.90	315.00	0.00
03/05/2021	Continue drafting request for information	BF	350.00	0.40	140.00	-140.00
03/12/2021	Conference with CS regarding motion to compel	BF	350.00	0.30	105.00	0.00
03/26/2021	Receive and review file with SMD. Letter to opposing counsel.	BF	350.00	0.10	35.00	-35.00
04/08/2021	Draft email to opposing counsel	BF	350.00	1.80	630.00	-630.00
05/26/2021	Research regarding consequences for failing to raise issues during the good-faith conference	BF	350.00	0.90	315.00	0.00
05/28/2021	Research for brief	BF	350.00	1.90	665.00	0.00
06/01/2021	Continue researching for brief	BF	350.00	0.40	140.00	0.00
06/15/2021	Draft brief	BF	350.00	2.30	805.00	0.00
06/17/2021	Continue drafting brief	BF	350.00	2.50	875.00	0.00
06/23/2021	Continue drafting brief	BF	350.00	2.20	770.00	0.00
07/06/2021	Continue drafting brief	BF	350.00	2.60	910.00	0.00
07/07/2021	Continue drafting brief	BF	350.00	2.80	980.00	0.00
07/08/2021	Continue drafting brief	BF	350.00	3.30	1,155.00	0.00
07/13/2021	Receive and review response to RFI from Haar	CS	415.00	0.10	41.50	-41.50

07/19/2021	Conference with CS regarding RFI response and next steps	BF	350.00	0.80	280.00	-280.00
07/19/2021	Conference with BF regarding RFI response and next steps	CS	415.00	0.80	332.00	-332.00
07/23/2021	Conference with BF to work on brief	CS	415.00	2.40	996.00	0.00
07/26/2021	Draft reply brief in support of motion to compel	BF	350.00	5.40	1,890.00	0.00
07/27/2021	Continue drafting brief	BF	350.00	2.50	875.00	0.00
08/02/2021	Finalize brief with CS	BF	350.00	0.80	280.00	0.00
08/03/2021	Conference with CS regarding defendants delay in responding to discovery questions.	BF	350.00	0.20	70.00	0.00
08/03/2021	Conference with BF regarding defendants delay in responding to discovery questions.	CS	415.00	0.20	83.00	0.00
08/05/2021	Conference with CS regarding strategy	BF	350.00	0.20	70.00	0.00
10/15/2021	Analyze discovery response with CS and chart out deposition strategy and future discovery strategy.	BF	350.00	2.40	840.00	0.00
10/21/2021	Conference with CS regarding discovery responses and strategy moving forward	BF	350.00	0.60	210.00	0.00
10/27/2021	Edit motion to compel with CS.	BF	350.00	0.30	105.00	0.00
11/09/2021	Call to client regarding retainer agreement. No answer, leave message	CS	415.00	0.10	41.50	-41.50
12/16/2021	Prepare RFI	ASW	150.00	1.00	150.00	-150.00
12/16/2021	Review and edit redline RFI.	BF	350.00	0.10	35.00	-35.00
12/16/2021	Edit RFI. Email to BF regarding redline RFI	CS	415.00	0.10	41.50	-41.50
12/16/2021	Email to Haar and Riley attaching RFI	CS	415.00	0.10	41.50	-41.50
01/18/2022	Receive and review email from Haar attaching response to RFI	CS	415.00	0.10	41.50	-41.50
02/02/2022	Email to Haar with response to RFI response	CS	415.00	0.10	41.50	-41.50
02/08/2022	Continue drafting SJ documents	BF	350.00	0.90	315.00	0.00
02/09/2022	Continue drafting SJ documents regarding liability for the TILA claim	BF	350.00	1.20	420.00	0.00
02/09/2022	Email to Haar asking after outstanding information from RFI	CS	415.00	0.10	41.50	-41.50
02/10/2022	Work on mediation memo with CS.	BF	350.00	0.30	105.00	0.00
02/11/2022	Receive and review email from Haar with additional RFI response	CS	415.00	0.10	41.50	-41.50
02/17/2022	Conference with CS regarding mediation	BF	350.00	1.30	455.00	0.00

Sub-total Fees: 22,496.50 -3,070.00

Net Fees After Discount: **19,426.50**

Expenses

<i>Date</i>	<i>Description</i>	<i>Price</i>	<i>Units</i>	<i>Amount</i>	<i>Discount</i>
<i>Sub-total Expenses:</i>					

Total

Net Fees After Discount: 19,426.50

Net Expenses After Discount: 0.00

Total: **19,426.50**